

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

**JOHN C. MONARCH, AN INDIVIDUAL;
DIRECT OUTBOUND SERVICES, LLC, A
SOUTH CAROLINA LIMITED LIABILITY
COMPANY**

Plaintiffs,

v.

**Civil Action No.: 2:14-cv-05980-
TON**

**RICHARD A. GORMAN; GORMAN
ECONOMICS, LLC, A DELAWARE LIMITED
LIABILITY COMPANY, DBA AT COST
FULFILLMENT, LLC; VANGUARD
ECONOMICS, LLC, A GEORGIA LIMITED
LIABILITY COMPANY DBA AT COST
FULFILLMENT, LLC DBA
FULFILLMENT.COM; AT COST
NUTRACEUTICALS, LLC, A GEORGIA
LIMITED LIABILITY COMPANY;
BRAND.COM, INC., A PENNSYLVANIA
CORPORATION; JOHN DOE 1; JOHN DOE 2;
AND JOHN DOE 3**

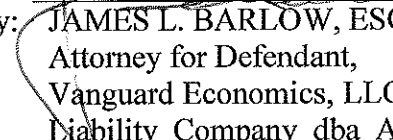
Defendant.

**DEFENDANT, VANGUARD ECONOMICS, LLC A GEORGIA LIMITED LIABILITY
COMPANY DBA AT COST FULFILLMENT, LLC DBA FULFILLMENT.COM'S
MOTION TO DISMISS COUNTS II, III, V, VII AND VII OF
PLAINTIFF'S COMPLAINT**

Pursuant to F.R.C.P. 12(b)(6), Defendant, Vanguard Economics, LLC a Georgia limited liability company dba At Cost Fulfillment, LLC dba Fulfillment.com moves to Dismiss Counts II, III, V, VII and VIII of Plaintiff's Complaint. In support of this Motion, Vanguard Economics, LLC a Georgia limited liability company dba At Cost Fulfillment, LLC dba Fulfillment.com

hereby adopts and incorporates by reference the arguments made in the Motion to Dismiss filed by Defendant, Brand.com.

LAW OFFICES OF JAMES L. BARLOW


By: JAMES L. BARLOW, ESQUIRE
Attorney for Defendant,
Vanguard Economics, LLC a Georgia Limited
Liability Company dba At Cost Fulfillment,
LLC dba Fulfillment.com